

REMARKS/ARGUMENTS

Rejection under 35 U.S.C. § 103

In the October 22, 2007 Office Action, the Examiner rejected claims 1–18 under 35 U.S.C. § 103 as obvious over Anderson (U.S. Patent No. 6,847,388) (hereinafter “Anderson”) in view of Nakagawa (U.S. Patent No. 6,738,092) (hereinafter “Nakagawa”) and Makishima et. al. (U.S. Patent No. 6,549,307) (hereinafter “Makishima”). However, applicants respectfully traverse this rejection as the combination of *Anderson*, *Nakagawa*, and *Makishima* does not disclose or render obvious the presently claimed invention.

a. Claims 1 and 10

Independent claims 1 and 10 of the presently claimed invention entail a digital camera and method for storing unprocessed bitmap data in a raw image file that also contains a first compressed image having a first resolution, and a second compressed image having a second selectable resolution. The Examiner has suggested that these features are disclosed in *Anderson*, in view of *Nakagawa*, further in view of *Makishima*. Applicants respectfully traverse the rejection because the combination of *Anderson*, *Nakagawa*, and *Makishima* fails to disclose or suggest a digital camera and method for storing full-resolution, unprocessed bitmapped image data from the camera’s image sensor together with two smaller processed image data segments suitable for viewing or printing including a selectable resolution, as in the present invention.

The presently claimed invention addresses the need for allowing a user to quickly view or print from RAW images files without the need to convert the full resolution, uncompressed RAW image files into other file formats by embedding two processed images, including one with a selectable resolution, together with the unprocessed bitmap data into a

RAW image file. In short, the techniques of the presently claimed invention entail converting unprocessed bitmap data into a first compressed image having a first resolution value, and a second compressed image having a user-selectable resolution value. Both compressed images are then embedded together with the raw image data into a file. Consequently, the user can quickly view or print images stored in the RAW file.

The Examiner contends that the combination of Anderson and Nakagawa would render the feature of combining a raw image and two compressed images into a single file obvious. However, the combination of *Anderson* and *Nakagawa* teaches away from this feature. The *Anderson* reference was discussed in connection with Applicant's prior response, and those arguments are incorporated by reference herein in their entirety. In short, as previously discussed, *Anderson* discloses storage of processed image data -- not unprocessed, full resolution bitmap image in a raw image file as recited in the claims of the present invention.

The Examiner, citing *Nakagawa*, contends that it would be obvious to store image data from two DRAM locations, a raw image in an area A and compressed data from a contiguous area B, in a single file. *Nakagawa* Col. 5, lines 15-23. While *Nakagawa* does disclose temporarily storing "original picture data" in an area A of DRAM and further discloses the existence of a contiguous area B (*Id.*), *Nakagawa* fails to disclose storing unprocessed bitmap data in a raw image file, as recited in claims 1 and 10. Instead, the original picture data in area A is never permanently stored on the removable media (a floppy disk in the *Nakagawa* reference). Instead, the data is first compressed into the JPEG format, and stored in that format, together with a smaller thumbnail image in DRAM. Col. 4, lns. 55-61 ("the micro-computer 28 causes the luminance signals Y and the chroma signals C to be stored during photographing of an object in a pre-set area of the DRAM 24 from the DRAM controller 25 in order to compress the stored

luminance signals Y and chroma signals C in accordance with the JPEG (Joint Photographic Coding Experts Group) system”). *See also* col. 7, lns. 12-14, 26-35, 46-52 (“‘S’ stands for the degree of data compression of the main picture files”); col. 8, lns. 26-35 (“main picture files and the thumbnail picture files are abbreviated to A.JPG . . . and A.411 . . . respectively).

Further, Nakagawa does not disclose storing a compressed image in area B, contrary to the Examiner’s suggestion. Area B in Nakagawa functions not to store compressed images, but rather as working memory for compressing or expanding the image data and to form a thumbnail. Col. 5, lns. 15-23. (“This area B also operates as an area for generating thumbnail data from the original picture data”). In fact, the compressed image and compressed thumbnail are located not in a contiguous area B, but in areas E and F, before they are eventually written to a file in the removable media. Col. 4, lines 55-64; Col. 6, lines 48-52; Col. 6, line 68-Col. 7, line 1. Areas E and F are non-contiguous with respect to area A (area A encompasses 9f00000-9f77fff, area E encompasses 9f90000-9fcffff, and area F encompasses 9fd0000-9fffff); Fig. 5. Nothing in *Anderson* or *Nakagawa* discloses information (such as a header or pointer) to associate non-contiguous areas of memory for the purposes of combining them into a single file. Without associating information, one of ordinary skill would not be motivated to combine image data in different, non-contiguous memory locations into a single file for the purpose of simplifying the presentation of the images on a separate computing device. In fact, while *Nakagawa* is directed to a digital camera for storing images on floppy disks so that the images may be viewed on a personal computer (Abstract), *Nakagawa* discloses storing the images as separate files on the floppy disk with only the similarity in filename serving to link one image to its counterpart. 7:25-28.

Accordingly, the combination of Anderson, Nakagawa, or Makishima does not produce the claimed invention. Moreover, nothing in the cited references would cause a person of ordinary skill to form the novel combination of a raw image file having uncompressed full resolution bitmapped data together with two lower resolution images at least one of which having a user-selectable resolution for ease of viewing or printing. Therefore, independent claims 1 and 10 distinguish over the cited references. Reconsideration of the rejection and allowance of claims 1 and 10 is therefore respectfully requested.

b. Claims 2-9 and 11-18

The Examiner has rejected dependent claims 2-9 and 11-18 over *Anderson* in view of *Nakagawa*, further in view of *Makshima*. Claims 2-9 and 11-18 distinguish over the cited art at least because they depend from claims 1 and 10, respectively.


Further, as noted in Applicant's prior amendment, the *Makashima* reference discloses a single monitor unit used to display the preview image data and the selectable resolution values. Nothing in *Makashima* discloses a display operable to show selectable resolution values that is distinct from the display operable to preview image data, as recited in pending claims 2 and 16. The Examiner cites *Makashima* (col. 2, lns. 10-13) as disclosing a "second display." This seems to be based on a misunderstanding of the *Makashima* disclosure. The cited passage distinguishes between an "image displaying means" and a "means for replaying image data recorded in a memory card" *Id.* col. 2, lns. 4-9. The two "means" being referred to, however, are simply different software or firmware functions of the disclosed camera, all of which are carried out using a single hardware display or "monitor unit". *See* col 3, ln. 57; col. 4, lns. 5-14 ("The electronic camera 1 in the above realizes 5 functions. . . In a preview photographing mode, an image is displayed on the monitor unit 6 immediately after

photographing . . . In a one-frame replay mode, images recorded in the memory card 11 are displayed on the monitor one by one”). Nothing in this reference discloses or suggests a second display, as required by claims 2 and 16. Claims 3-9 and 17-18, which depend from claims 2 or 16 are further allowable for the same reasons.

In light of these arguments and amendments, reconsideration of the rejections, and prompt allowance of the pending claims is respectfully requested.

Respectfully submitted,

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